



Rock County Land Conservation Department

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To Whom It May Concern;

I was asked by a member of the "ROCK against the RAIL" to review the proposed Great Lakes Rail corridor for Environmental and Other Issues that may result from the construction of proposed rail line as of this date. Some of the issues I have identified, will be addressed by various County Ordinances, State Laws and Federal Laws. Therefore, I am only identifying issues that are pertinent to Rock County. Also, please note that I have provided only an introductory to the issue, as each segment of the rail line as proposed will have various issues that need to be addressed.

- 1.) **Wetlands.** While the planners have done a good job avoiding many of the Wisconsin Department of Natural Resource (WDNR) mapped wetlands, numerous wetlands will be impacted along the proposed line. WDNR permits and possible mitigation will be needed for any wetland disturbance. The Army Corps of Engineers would also review any wetland disturbance.

Please note: The WDNR has taken a stance on hydric soils in the State and they are putting the burden of proof on the landowners to prove there are no unmapped wetlands on the property. This will be a large part of the project in the Clinton area.

- 2.) **Subsurface drainage.** Most agricultural field tile lines are unmapped in Rock County. Many of these system are 60+ years old. Laterals and mains, intersecting the proposed line will need to be rerouted as to allow for maintenance of said in the future. I am assuming that all field drainage lines will not be allowed to remain under the proposed railroad right of way. The flow in many of our smaller streams (perennial and intermittent) depends on outlet tile water to maintain base flow. Many acres of cropland would be impacted if the subsurface drainage is not adequately addressed.
- 3.) **Wildlife Habitat.** The construction of this rail line, as proposed will further fragment the blocks of wildlife habitat in the immediate area of the line. Studies have shown that as land is divided by manmade structures, various terrestrial wildlife populations shrink and populations become separated. A railroad corridor will limit the movement of wildlife and the interaction of populations.

- 4.) **Forestry.** While Rock County is not a heavily wooded county, this railroad corridor intercepts several large blocks of woods. Forestry activities will be limited if these areas are divided. Some of the wooded parcels are in the State of Wisconsin Managed Forest program. These parcels have forest management plans that contain required periodic forest management practices. This is another area that fits with the Wildlife Habitat issue.
- 5.) **Farmland Protection.** In Rock County agriculture is one of the leading industries. Once farmland is lost to another land use it will never be brought back into crop production. Rock County, the State of Wisconsin and the Federal Government all have Farmland Protection programs at work in county. The goal of these programs is to preserve Farmland. Some of the lands proposed to have the rail corridor go through are in one or more of these programs. The removal of these lands from the program will be on a program by program basis.
- 6.) **Farmland Fragmentation.** The dividing of crop fields into smaller fields or odd shaped fields hurts the ability of producers to crop the land. Agriculture has continued to evolve using larger more efficient equipment, if the fields get smaller the equipment and fields won't work together. The railroad corridor has sections that run at angles that don't coincide with the property lines, this will make for "odd" shaped fields that are difficult to farm. Another issue with the rail corridor is the access to be able to access crop fields on both sides of the corridor. Many times access roads are required to be constructed to access a field that is now on the backside of the corridor. The I-43 corridor is a prime example of how difficult it can be to access a portion of a field that was once one field.
- 7.) **Stormwater Runoff.** Numerous agencies have ordinances and/or statutes to address this issue. If jurisdiction falls to a local unit of government, Rock County has an ordinance to address the issue. The rail corridor will be a graveled surface that will have the potential to increase the stormwater runoff rates of flow. This could include the need for stormwater detention ponds. The water from the rail corridor will need to be controlled as not to cause any off-site impacts. Surface drainage patterns will need to be improved and maintained.
- 8.) **Erosion Control.** Numerous agencies have ordinances and/or statutes to address this issue. If jurisdiction falls to a local unit of government, Rock County has an ordinance to address this issue. This would be a construction time issue. Erosion control measures will be required during the construction phase of the project and last until all areas are stabilized. No off-site impacts are allowed.
- 9.) **Borrow sites.** We have not seen a grading plan for this project. Areas could be mined and have that material used as fill. These areas should fall under the nonmetallic mining ordinance. If the project was to get the same status as a state funded road project then local control of these areas would be limited. The same could be true of areas of excess fill. Where the corridor crosses a stream or a road, and the corridor is raised, areas of fill that would be permanent could not interfere with the flow of the stream.

10.) **Other Agricultural Program Impacts:** There are fields in many different programs that will be affected by the rail corridor. Some of these programs are: **Conservation Reserve Program/ Conservation Reserve Enhancement Program.** These programs retire cropland that are environmentally sensitive for periods of 10 to 15 years. These areas are seeded to native cover to provide wildlife habitat, reduce erosion, filter nutrients from runoff water, and attenuate pollutants from ground water.

Conservation Stewardship Program. The Conservation Stewardship Program (CSP) is a voluntary conservation program that encourages producers to continue to improve and maintain existing conservation activities as well as undertake additional conservation activities. This is completed through contracts based on the producer's cropland.

Sincerely,

A handwritten signature in cursive script that reads "Norman J. Tadt Jr.".

Norman J. Tadt Jr.
Senior Conservation Specialist